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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

A.G.,

Case No: 2:24-CV-01375 DJC CKD

Plaintiff,

STIPULATION REGARDING FIRST
AMENDED COMPLAINT;
ORDER

v.

COUNTY OF SISKIYOU, JENNIFER
MOODY, CHILDREN FIRST FOSTER
AGENCY, DOES 1-100, INCLUSIVE,

Defendants.

Plaintiff A.G., and Defendants County of Siskiyou and Jennifer Moody hereby enter into
the following stipulation regarding the First Amended Complaint:

WHEREAS, on June 25, 2024, Defendant County of Siskiyou filed a Motion to Dismiss
Plaintiff's Complaint (EF 13);

WHEREAS, on July 9, 2024, Plaintiff filed an opposition to the Motion to Dismiss
(EF16);

WHEREAS, on July 18, 2024, Defendant County of Siskiyou filed a reply related to the
Motion to Dismiss (EF 17);

WHEREAS, on November 11, 2024 this Court issued an Order on the Motion to Dismiss
granting Plaintiff leave to file a first amended complaint within 21 days of the order (EF 19);

WHEREAS, on December 2, 2024, Plaintiff became aware of the Court's order after the time to file the first amended complaint had passed. Due to excusable neglect, Plaintiff did not receive notice of the Court's Order prior to December 2, 2024. Plaintiff's counsel apologizes to the Court and are working to correct the issue as to why ECF filing notices have not been received in this case.

BASED ON THE FOREGOING, the parties to this stipulation, seek an order from this Court holding that Plaintiff's First Amended Complaint be filed on or before December 18, 2024.

DATED: December 9, 2024

ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/ Kaitlyn D. Wright
Scott R. Montgomery, Esq.
Kaitlyn D. Wright, Esq.
Attorney for Plaintiff A.G.

Authorized on December 6, 2024

PORTER SCOTT

By: /s/ Lindsay A. Goulding
Lindsay A. Goulding, Esq.
Attorney for Defendants County of
Siskiyou and Jennifer Moody

Authorized on December 20, 2024

CLAPP, MORONEY, VUCINICH, BEEMAN &
SCHELEY

By: /s/ Christopher J. Beeman
Christopher J. Beeman, Esq.
Attorney for Defendant His Ideas, Inc.
(erroneously sued as Children First Foster
Agency)

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ORDER

Based on the reasons set forth in the stipulation of the parties, and good cause appearing therefrom, the Court adopts the stipulation of the parties.

IT IS HEREBY ORDERED that Plaintiff shall file a First Amended Complaint on or before December 18, 2024.

Dated: December 20, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE